

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

PENINSULA PETROLEUM LIMITED,

Plaintiff,

- against -

CI INTERNATIONAL FUELS LLC,

Defendant.

Case No.: 22-cv-20712-RKA

**DECLARATION OF GABRIELA SANCHEZ URZAIS IN OPPOSITION TO  
DEFENDANT'S MOTION TO DISMISS PLAINTIFF'S VERIFIED COMPLAINT**

Pursuant to 28 U.S.C. §1746, Gabriela Sanchez declares as follows:

1. I am Senior Legal Associate affiliated with Plaintiff, Peninsula Petroleum Limited (“Peninsula”), and have been so affiliated at all times referred to in the foregoing Verified Complaint filed in this matter. I am also the person who verified the Verified Complaint in this matter. I am fully competent to testify and swear or affirm that the following is true based upon my own personal knowledge.

2. On behalf of Peninsula, I signed the Master Sale and Purchase Agreement with CI International Fuels LLC (“CI Int’l”) and I am familiar with its provisions.

3. I make reference to the accompanying declaration from Mauricio Perez Grosso (with which I am also familiar) and to the Verified Complaint, in which Peninsula establishes the debt owed by CI Int’l in the principal amount of \$1,545,293.56 (plus interest).

4. In my capacity as Senior Legal Associate affiliated with Peninsula, I interacted with an outside legal representative of Defendant CI International Fuels LLC (“CI Int’l”), Willingthon Perinán. These interactions were the result of the default notices that I caused to be sent to CI Int’l

on behalf of Peninsula in August, 2021. (See, Verified Cmplt. ¶ 31-33.) The default notices were sent as a result of CI Int'l's failure to pay the invoices that had been agreed upon when due.

5. A true and correct copy of an initial email I received from Mr. Perinán on October 5, 2021 (with an English translation thereof) is attached to this Declaration as Exhibit 1. I note that he specifically referenced CI Int'l's total payment obligation of \$1,545,293.56, and sought to have CI Int'l pay that debt in nine installments.

6. Mr. Perinán and I exchanged a few other emails and spoke telephonically but were unable to resolve CI Int'l's obligation to pay its debt to Peninsula. CI Int'l has never paid the debt that it owes to Peninsula.

7. In connection with other business dealings between Peninsula and CI Int'l, as recently as May, 2021, CI Int'l has issued invoices to Peninsula bearing a Florida corporate address.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 14, 2022.

A handwritten signature in black ink, appearing to be 'G. Sanchez Urzais', with a long horizontal line extending to the right.

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Gabriela Sanchez Urzais